The Iowa Department of Natural Resources (DNR) finds that:

1. Quality Manufacturing Corporation, located at 4300 NW Urbandale Drive, Urbandale, Iowa 50322 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Dan Carder, General Manager.

2. Quality Manufacturing Corporation is a Custom Steel Fabricator (SIC 3499). This facility consists of 14 significant emission units with potential emissions of:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Abbreviation</th>
<th>Potential Emissions (Tons per Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (≤ 2.5 µm)</td>
<td>PM$_{2.5}$</td>
<td>48.15</td>
</tr>
<tr>
<td>Particulate Matter (≤ 10 µm)</td>
<td>PM$_{10}$</td>
<td>48.15</td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>PM</td>
<td>48.15</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>SO$_2$</td>
<td>0.02</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>NO$_x$</td>
<td>3.60</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>VOC</td>
<td>227.48</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>CO</td>
<td>3.03</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (1)</td>
<td>HAP</td>
<td>24.4</td>
</tr>
</tbody>
</table>

(1) May include the following: Chromium compounds, Cumene, Ethylene Glycol, Glycol Ethers, Manganese compounds, Methyl Isobutyl Ketone, Naphthalene, Nickel compounds, and Xylene (mixed isomers).

3. Quality Manufacturing Corporation submitted a Title V Operating Permit renewal application on April 2, 2019. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.

4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.
DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from April 2, 2020 through May 2, 2020. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to Jeff Gabby at the Polk County address shown below.

2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jeff Gabby at the Polk County address shown below.

3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Jeffrey M. Gabby  
Air Permit Engineer  
Polk County Public Works Department  
Air Quality Division  
5885 NE 14th Street  
Des Moines, Iowa 50313  
Phone: (515) 286-3389  
E-mail: jeffrey.gabby@polkcountyiowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.
Application Evaluation

A. Project Briefing:

This project regards a Part 70 Title V permit renewal application to operate (14) significant emission units. Conditions transfer into the Title V Operating Permit from the following Polk County Construction Permits:

- PC #1849 Modified, JBI Model T-34-PDT Paint Booth with Dry Filters (EU 1.00 / CE 1.00 / EP 1.00)
- PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00)
- PC #1853 Modified #2, Col-Met Parts Washer (EU 3.00 / EP 3.00)
- PC #1850 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 4.00 / CE 4.00 / EP 4.00)
- PC #1851 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 5.00 / CE 5.00 / EP 5.00)
- PC #1848 Modified #2, Rework Sanding Rail Car – hand sanders with Donaldson Model DF02-8 Cartridge Filter (EU 8.00 / CE 8.00 / EP 8.00)
- PC #2297 Modified #3, Parts Washer (EU 9.00 / EP 9.00)
- PC #2298 Modified, Custom Built Paint Booth with Dry Filters (EU 11.00 / CE 11.00 / EP 11.00)
- PC #2299 Modified, Custom Built Paint Booth with Dry Filters (EU 12.00 / CE 12.00 / EP 12.00)
- PC #2580, Production Welding (EU 13.00 / EP 13.00F)
- PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / CE Loc 3-1 / EP Loc 3-1)

Dry Off Oven (0.97 MMBtu/hour Natural Gas) (EU 6.00); (1) Cure Oven (1.12 MMBtu/hour Natural Gas) (EU 7.00); (1) Drying Oven 5.3 MM Btu/hour Natural Gas) (EU 10.00) are exempt from construction permitting because of fuel and size [Chapter V, Article X, Division 1, ¶5-33 (1)- Natural Gas, <10 MM Btu/hr]. They are exempt from NESHAP Subpart XXXXXX, because the paints being dried in them do not contain any of the Target HAPs from Subpart XXXXXX. These 3 dry-off and cure ovens do not qualify as insignificant units, however, because they must be included in the plant-wide VOC and HAP emission PTE cap. They will be treated as significant units, with recordkeeping and emission inventory requirements for actual emissions. They are subject to the default limits of <20% for opacity, 0.10 gr./dscf for PM, and 500 ppmv for SO2.

(EU PW-1): 0.375 MMBtu/hr Natural Gas Fired Power Washer is insignificant per 567 IAC22.103.

B. Applicable rules and regulations:

1. Emission limits and conditions:

- PC #1849 Modified, JBI Model T-34-PDT Paint Booth with Dry Filters (EU 1.00 / CE 1.00 / EP 1.00) limits PM/PM10 to 2.19 lbs/hr, 7.99 TPY, and 0.01 gr/dscf; Opacity to No Visible Emissions; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) limits PM10 to 0.008 lbs./hr, 0.033 TPY; Opacity to <20%; SOx to 0.001 lbs./hr, 0.003 TPY; NOx to 0.1 lbs./hr, 0.438 TPY; VOC to 0.006 lbs./hr, 0.024 TPY; and CO to 0.084 lbs./hr, 0.37 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article VI, Section 5-14(b) limits PM to 0.10 gr./dscf.
- PC #1853 Modified #2, Col-Met Parts Washer (EU 3.00 / EP 3.00) limits plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #1850 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 4.00 / CE 4.00 / EP 4.00) limits PM/PM\(_{10}\) to 1.03 lbs/hr, 3.76 TPY, and 0.01 gr/dscf; Opacity to No Visible Emissions; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #1851 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 5.00 / CE 5.00 / EP 5.00) limits PM/PM\(_{10}\) to 1.03 lbs/hr, 3.76 TPY, and 0.01 gr/dscf; Opacity to No Visible Emissions; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #1848 Modified #2, Rework Sanding Rail Car – hand sanders with Donaldson Model DF02-8 Cartridge Filter (EU 8.00 / CE 8.00 / EP 8.00) limits PM/PM\(_{10}\)/PM\(_{2.5}\) to 1.03 lbs/hr, 4.51 TPY, and 0.02 gr/dscf.
- PC #2297 Modified #3, Parts Washer (EU 9.00 / EP 9.00) limits PM/PM\(_{10}\)/PM\(_{2.5}\) to 0.42 lbs/hr, 1.84 TPY, PM to 0.005 gr/dscf; Opacity to <20%; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #2298 Modified, Custom Built Paint Booth with Dry Filters (EU 11.00 / CE 11.00 / EP 11.00) limits PM/PM\(_{10}\) to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf; Opacity to No Visible Emissions; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY. (CE 11.00 / EP 11.00) consists of 4 stacks (EP 11A, 11B, 11C, and 11D), controlled by 4 Dry Filters (CE 11A, 11B, 11C, and 11D).
- PC #2299 Modified, Custom Built Paint Booth with Dry Filters (EU 12.00 / CE 12.00 / EP 12.00) limits PM/PM\(_{10}\) to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf; Opacity to No Visible Emissions; plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY. (CE 12.00 / EP 12.00) consists of 4 stacks (EP 12A, 12B, 12C, and 12D), controlled by 4 Dry Filters (CE 12A, 12B, 12C, and 12D).
- PC #2580, Production Welding (EU 13.00 / EP 13.00) limits PM/PM\(_{10}\) to 12.05 TPY, 0.10 gr/dscf; Opacity to No Visible Emissions; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY.
- PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / CE Loc 3-1 / EP Loc 3-1) limits PM/PM\(_{10}\) to 0.39 lbs./hr., 1.71 TPY, 0.005 gr/dscf; and Opacity to No Visible Emissions.
- (1), Dry Off Oven (0.97 MMBtu/ hour Natural Gas) (EU 6.00); (1) Cure Oven (1.12 MMBtu/hour Natural Gas) (EU 7.00); (1) Drying Oven 5.3 MM Btu/ hour Natural Gas) (EU 10.00) are subject to the default rule limits of <20% for opacity, 0.10 gr./dscf for PM, and 500 ppmv for SO2.

2. Opacity for the facility: Less than 20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9.
- Polk County Construction Permit 1849 Modified limits opacity for JBI Model T-34-PDT Paint Booth with Dry Filters (EU 1.00 / CE 1.00 / EP 1.00) to no visible emissions allowed.
- PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) limits Opacity to <20%.
- PC #1850 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 4.00 / CE 4.00 / EP 4.00) limits Opacity to No Visible Emissions allowed.
- PC #1851 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 5.00 / CE 5.00 / EP 5.00) limits Opacity to No Visible Emissions allowed.
- (EU 8.00 / CE 8.00 / EP 8.00) Rework Sanding Rail Car – hand sanders, with Donaldson DF02-8 Cartridge Filter is limited to <20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9.
- PC #2297 Modified #3, Parts Washer (EU 9.00 / EP 9.00) limits Opacity to <20%.
- PC #2298 Modified, Custom Built Paint Booth with Dry Filters (EU 11.00 / CE 11.00 / EP 11.00) limits Opacity to No Visible Emissions allowed.
- PC #2299 Modified, Custom Built Paint Booth with Dry Filters (EU 12.00 / CE 12.00 / EP 12.00) limits Opacity to No Visible Emissions allowed.
- PC #2580, Production Welding (EU 13.00 / EP 13.00F) limits Opacity to No Visible Emissions allowed.
- PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / CE Loc 3-1 / EP Loc 3-1) limits Opacity to No Visible Emissions.

3. NSPS: Not applicable at this time.

4. NESHAP:

40 CFR Part 63, Subpart HHHHHH: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does not apply. The paint coatings do not contain any target HAPs. PC# 1849 Modified, 1850 Modified, 1851 Modified, 2298 Modified, and 2299 Modified prohibit the use of any materials which would make the facility subject to Subpart HHHHHH.

40 CFR Part 63, Subpart XXXXXX: Metal Fabrication and Finishing. NESHAP 6X applicability is determined separately for each process, and only applies if the process emits MF HAP (Metal Fabrication and Finishing Hazardous Air Pollutants). Since there are no MFHAP in the paints at Quality Manufacturing, then 6X does not apply to the paint booths. The 6X affected units are the welding and abrasive blasting operations, (EU 13.00 Welding, and EU Loc3-1 Sandblasting). The applicable requirements of NESHAP 6X have been placed into these three emission unit’s sections. The web-link to NESHAP Subpart XXXXXX has been placed in the Title V Permit, Appendix A.

- CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) is not subject to Subpart 6X, because the paint being dried does not contain MFHAP.
- (EU 4.00 / CE 4.00 / EP 4.00) is not a Subpart 6X affected unit, because the paint does not contain MFHAP, and Subpart 6X requirements are not placed into the Title V permit for EU 4.00.
- (EU 5.00 / CE 5.00 / EP 5.00) is not a Subpart 6X affected unit, because the paint does not contain MFHAP, and Subpart 6X requirements are not placed into the Title V permit for EU 5.00.
- Rework Sanding Rail Car – hand sanders with Donaldson Model DF02-8 Cartridge Filter (EU 8.00 / CE 8.00 / EP 8.00) is not an affected EU for NESHAP Subpart 6X, since MFHAP is not present in EU 8.00.
- Polk County AQD #2297 Modified #3 restricts (EU 9.00) to being a synthetic minor for HAPs.
- (EU 11.00 / CE 11.00 / EP 11.00) is not a Subpart 6X affected unit, because the paint does not contain MFHAP, and Subpart 6X requirements are not placed into the Title V permit for EU 11.00.
- (EU 12.00 / CE 12.00 / EP 12.00) is not a Subpart 6X affected unit, because the paint does not contain MFHAP, and Subpart 6X requirements are not placed into the Title V permit for EU 12.00.

5. PSD: Source is minor (PSD) and will need to submit a PSD permit application only if a PSD qualifying change is made, i.e., applying for a PSD pollutant increase greater than 250 TPY.

6. NAAQS: Facility is located in an attainment area. Air modeling is not required at this time.

7. Title IV: Not applicable.
8. Stratospheric ozone: the only ozone depleting chemicals (regulated by 40 CFR 82) at the facility are those used for air conditioning. 40 CFR 82, Subpart F, applies to the disposal of appliances containing Class I or Class II substances (i.e. air conditioners).

9. PM-10: (PM\textsubscript{2.5} is assumed to equal PM and PM\textsubscript{10}, since separate emission factors were not found.)

- Polk County Construction Permit 1849 Modified limits PM\textsubscript{10} for Model T-34-PDT Paint Booth with Dry Filters (EU 1.00 / CE 1.00 / EP 1.00) to 2.19 lbs/hr, 7.99 TPY, and 0.01 gr./dscf.
- PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) limits PM\textsubscript{10} to 0.008 lbs./hr, 0.033 TPY.
- PC #1850 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 4.00 / CE 4.00 / EP 4.00) limits PM/PM\textsubscript{10} to 1.03 lbs/hr, 3.76 TPY, and 0.01 gr./dscf.
- PC #1851 Modified, Col-Met Model EPD-1210-10-PDT Paint Booth with Dry Filters (EU 5.00 / CE 5.00 / EP 5.00) limits PM/PM\textsubscript{10} to 1.03 lbs/hr, 3.76 TPY, and 0.01 gr./dscf.
- PC #1848 Modified #2, Rework Sanding Rail Car – hand sanders with Donaldson Model DF02-8 Cartridge Filter (EU 8.00 / CE 8.00 / EP 8.00) limits PM / PM\textsubscript{10} / PM\textsubscript{2.5} to 1.03 lbs/hr, 4.51 TPY, and 0.02 gr/dscf.
- PC #2297 Modified #3, Parts Washer (EU 9.00 / EP 9.00) limits PM/PM\textsubscript{10} / PM\textsubscript{2.5} to 0.42 lbs/hr, 1.84 TPY, PM to 0.005 gr/dscf.
- PC #2298 Modified, Custom Built Paint Booth with Dry Filters (EU 11.00 / CE 11.00 / EP 11.00) limits PM/PM\textsubscript{10} to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf.
- PC #2299 Modified, Custom Built Paint Booth with Dry Filters (EU 12.00 / CE 12.00 / EP 12.00) limits PM/PM\textsubscript{10} to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf.
- PC #2580, Production Welding (EU 13.00 / EP 13.00F) limits PM/PM\textsubscript{10} to 12.05 TPY, 0.10 gr/dscf.
- PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / EP Loc 3-1 / EP Loc 3-1) limits PM/PM\textsubscript{10} to 0.39 lbs/hr., 1.71 TPY, 0.005 gr/dscf.

C. Compliance Assurance and Monitoring consideration:

- (EU 1.00 / CE 1.00 / EP 1.00) has a PM/PM\textsubscript{10} PTE of 2.19 lbs/hr, 7.99 TPY, and 0.01 gr/dscf (controlled minor) and an uncontrolled PM/PM\textsubscript{10} PTE of 79.9 TPY (uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. DNR requires a standard Agency O&M Plan for all paint booths, in lieu of the Facility O&M Plan. CAM not required because the post-control PM/PM\textsubscript{10} emission potentials are less than 100 TPY.
- PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) limits PM\textsubscript{10} to 0.008 lbs./hr, 0.033 TPY; Opacity to <20%; SO\textsubscript{2} to 0.001 lbs./hr, 0.003 TPY; NO\textsubscript{x} to 0.1 lbs./hr, 0.438 TPY; VOC to 0.006 lbs./hr, 0.024 TPY; and CO to 0.084 lbs./hr, 0.37 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article VI, Section 5-14(b) limits PM to 0.10 gr/dscf. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required because there is no control equipment for this unit.
- PC #1853 Modified #2, Col-Met Parts Washer (EU 3.00 / EP 3.00) limits plant-wide VOC to 227.48 TPY; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY. Record keeping and reporting requirements from PC #1853 Modified #2 will ensure compliance with these limits. No additional monitoring is required under DNR Monitoring Guidance Policy. CAM not required because there are no unit-specific limits and no control equipment for this unit.
• (EU 4.00 / CE 4.00 / EP 4.00) has a PM/PM₁₀ PTE of 1.03 lbs/hr, 3.76 TPY, and 0.01 gr/dscf (controlled minor) and an uncontrolled PM/PM₁₀ PTE of 37.6 TPY (PM uncontrolled minor, PM₁₀ uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. DNR requires, however, a standard Agency O&M Plan for all paint booths. CAM not required because the pre-control PM/PM₁₀ emission potentials are less than 100 TPY.

• (EU 5.00 / CE 5.00 / EP 5.00) has a PM/PM₁₀ PTE of 1.03 lbs/hr, 3.76 TPY, and 0.01 gr/dscf (controlled minor) and an uncontrolled PM/PM₁₀ PTE of 75.2 TPY (PM/PM₁₀ uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. DNR requires, however, a standard Agency O&M Plan for all paint booths. CAM not required because the pre-control PM/PM₁₀ emission potentials are less than 100 TPY.

• PC #1848 Modified #2, Rework Sanding Rail Car – hand sanders with Donaldson Model DF02-8 Cartridge Filter (EU 8.00 / CE 8.00 / EP 8.00) limits PM/PM₁₀/PM₂.₅ to 1.03 lbs/hr, 4.51 TPY, and 0.02 gr/dscf; (controlled minor) and an uncontrolled PM/PM₁₀/PM₂.₅ PTE of 45.1TPY (PM/PM₁₀/PM₂.₅ uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. CAM not required because the pre-control PM/PM₁₀/PM₂.₅ emission potentials are less than 100 TPY.

• PC #2297 Modified #3, Parts Washer (EU 9.00 / EP 9.00) limits PM/PM₁₀ to 0.42 lbs/hr, 1.84 TPY; PM to 0.005 gr/dscf; (uncontrolled minor). Record keeping and reporting requirements from PC #2297 Modified #3 will ensure compliance with these limits. No additional monitoring is required under DNR Monitoring Guidance Policy. CAM not required because the PM/PM₁₀ emission potentials are less than 100 TPY. {A stack test was required under PC Construction Permit #2297 for EU #9.00. Three Method 5 with EPA Method 202 back half catch particulate tests were performed on July 2, 2013 for PM₁₀. The allowable emission rate is 0.42 lb/hr. Test results were 0.32 lb/hr, 0.23 lb/hr, and 0.08 lb/hr.}

• PC #2298 Modified, Custom Built Paint Booth with Dry Filters (EU 11.00 / CE 11.00 / EP 11.00) limits PM/PM₁₀ to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf (controlled minor) and an uncontrolled PM/PM₁₀ PTE of 61.3 TPY (PM₁₀ uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. DNR requires, however, a standard Agency O&M Plan for all paint booths. CAM not required because the pre-control PM/PM₁₀ emission potentials are less than 100 TPY. {A stack test was required under PC AQD Construction Permits #2298 Modified and #2299 Modified to be completed for either EU #11.00 or EU #12.00. Three Method 17 particulate tests were performed on May 6, 2014 for PM on EP 11A, 11B, 11C, and 11D. (PC #2298 Modified specified EPA Method 201 with 202, but the facility requested Method 17 as an alternative. The alternative was approved in the pre-test meeting.) The allowable emission rate for EP 11.00 is 1.69 lb/hr and 0.007 gr/dscf. Test results were:
  o EP 11A: 0.0616 lb/hr, 0.0009 gr/dscf; 0.0618 lb/hr, 0.0010 gr/dscf; and 0.0611 lb/hr, 0.0010 gr/dscf
  o EP 11B: 0.0658 lb/hr, 0.0011 gr/dscf; 0.0656 lb/hr, 0.0011 gr/dscf; and 0.0651 lb/hr, 0.0011 gr/dscf
  o EP 11C: 0.0639 lb/hr, 0.0010 gr/dscf; 0.0642 lb/hr, 0.0010 gr/dscf; and 0.0637 lb/hr, 0.0010 gr/dscf
  o EP 11D: 0.0653 lb/hr, 0.0010 gr/dscf; 0.0651 lb/hr, 0.0010 gr/dscf; and 0.0650 lb/hr, 0.0010 gr/dscf
The test results were acceptable and met the requirements specified in PC AQD Construction Permits #2298 Modified and #2299 Modified.}

• PC #2299 Modified, Custom Built Paint Booth with Dry Filters (EU 12.00 / CE 12.00 / EP 12.00) limits PM/PM₁₀ to 1.68 lbs/hr, 6.13 TPY, and 0.007 gr/dscf (controlled minor) and an uncontrolled PM/PM₁₀ PTE of 61.3 TPY (PM₁₀ uncontrolled significant). DNR Monitoring Guidance Policy calls for a Facility O&M Plan and no tests. DNR requires, however, a standard Agency O&M Plan for all paint booths. CAM not required because the pre-control PM/PM₁₀ emission potentials are less than 100 TPY. {A stack test was required under PC AQD Construction Permits #2298 Modified and #2299 Modified to be completed for either EU #11.00 or EU #12.00. See results in the paragraph above for testing results completed on EP 11.00.}
• PC #2580, Production Welding (EU 13.00 / EP 13.00F) limits PM/PM$_{10}$ to 12.05 TPY, (uncontrolled minor), 0.10 gr/dscf; Opacity to No Visible Emissions; plant-wide single HAP to 9.40 TPY; and plant-wide combined HAPs to 24.4 TPY (uncontrolled minor). EU 13.00 is vented fugitively, internally. DNR Monitoring Guidance Policy calls for no O&M Plan and no tests. CAM not required because there are no control equipment for this unit. Method 22 and Method 9 are required by NESHAP 40 CFR 63 Subpart XXXXXX. These requirements have been placed into the Title V Monitoring Section for EU 13.00.

• PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / CE Loc 3-1 / EP Loc 3-1) limits PM/PM$_{10}$ to 0.39 lbs./hr., 1.71 TPY, (controlled minor) 0.005 gr/dscf, and Opacity to No Visible Emissions. (uncontrolled minor PM, uncontrolled significant PM$_{10}$ : 28.5 TPY). DNR Monitoring Guidance Policy calls for a Facility O&M Plan for PM$_{10}$ and no tests. CAM not required because the pre-control PM/PM$_{10}$ emission potentials are less than 100 TPY.

• Dry Off Oven (0.97 MMBtu/ hour Natural Gas) (EU 6.00 / EP 6.00) has uncontrolled PTEs of 0.03 TPY PM/ PM$_{10}$, 0.003 TPY SOx, 0.42 TPY NOx, 0.02 TPY VOC, and 0.35 TPY CO (all uncontrolled minor). Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 6.00 to less than 20% opacity. No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required because there is no control equipment for this unit.

• (1) Cure Oven (1.12 MMBtu /hour Natural Gas) (EU 7.00 / EP 7.00) has uncontrolled PTEs of 0.04 TPY PM/ PM$_{10}$, 0.003 TPY SOx, 0.48 TPY NOx, 0.03 TPY VOC, and 0.41 TPY CO (all uncontrolled minor). Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 7.00 to less than 20% opacity. No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required because there is no control equipment for this unit.

• (1) Drying Oven 5.3 MM Btu/ hour Natural Gas) (EU 10.00 / EP 10.00) has uncontrolled PTEs of 0.17 TPY PM/ PM$_{10}$, 0.01 TPY SOx, 2.26 TPY NOx, 0.12 TPY VOC, and 1.90 TPY CO (all uncontrolled minor). Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 10.00 to less than 20% opacity. No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required because there is no control equipment for this unit.

Opacity:

• (EU 1.00 / CE 1.00 / EP 1.00), (EU 4.00 / CE 4.00 / EP 4.00), (EU 5.00 / CE 5.00 / EP 5.00), (EU 11.00 / CE 11.00 / EP 11.00), (EU 12.00 / CE 12.00 / EP 12.00), all have "No Visible Emissions" opacity requirements. They will each be required to have their EPs checked once a week for visible emissions, while the EU is operating. Record keeping and immediate corrective action will be required, if any visible emissions are observed.

• PC #1603, CCI Thermal Technologies Cure Oven (EU 2.01 / EP 2.00) limits Opacity to <20%. The cure oven is natural gas fired. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted.

• (EU 8.00 / CE 8.00 / EP 8.00) Rework Sanding Rail Car – hand sanders, with Donaldson DF02-8 Cartridge Filter is limited to <20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. Weekly VE checks will be required, along with a Method 9 testing and corrective action, if any VEs are observed.

• EU 9.00 / EP 9.00 is limited to <20% opacity by Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 and PC # 2297 Modified #3. Monitoring for opacity will not be required, since parts washers normally emit very little PM and opacity.

• PC #2580, Production Welding (EU 13.00 / EP 13.00F) limits Opacity to No Visible Emissions. Method 22 and Method 9 are required by NESHAP 40 CFR 63 Subpart XXXXXX. These requirements have been placed into the Title V Monitoring Section for EU 13.00.
• PC #2581, Empire Sandblast Unit with Donaldson Baghouse (EU Loc 3-1 / CE Loc 3-1 / EP Loc 3-1) limits Opacity to No Visible Emissions. Method 22 testing is required by NESHAP 40 CFR 63 Subpart XXXXXX. These requirements have been placed into the Title V Monitoring Section for EU Loc 3-1.

• Dry Off Oven (0.97 MMBtu/hour Natural Gas) (EU 6.00 / EP 6.00): Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 6.00 to less than 20% opacity. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted.

• (1) Cure Oven (1.12 MMBtu/hour Natural Gas) (EU 7.00 / EP 7.00): Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 7.00 to less than 20% opacity. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted.

• (1) Drying Oven 5.3 MM Btu/hour Natural Gas) (EU 10.00 / EP 10.00): Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 limits EP 10.00 to less than 20% opacity. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted.

VOC:

PC AQD Construction Permits #: 1849 Modified, 1853 Modified #2, 1850 Modified, 1851 Modified, 2297 Modified #3, 2298 Modified, and 2299 Modified each have a plant-wide VOC limit of 227.48 TPY, rolled monthly. All permits have appropriate record keeping and reporting on a 12 month rolling basis to ensure compliance with the plant-wide limit. No additional VOC Monitoring is needed or warranted.

HAPs:

Polk County AQD Construction Permit #1849 Modified, 1853 Modified #2, 1850 Modified, 1851 Modified, 2297 Modified #3, 2298 Modified, 2299 Modified, and 2580 each have a plant-wide single HAP emission limit of 9.40 TPY, rolled monthly, and a plant-wide combined HAP emission limit of 24.4 TPY, rolled monthly. They have appropriate record keeping and reporting on a 12 month rolling basis to ensure compliance with the plant-wide limits. No additional HAP Monitoring is needed or warranted.

D. Facility Proposed Limits: None proposed.

E. Responsible Official: Mr. Dan Carder, General Manager, is in charge of a principle business function, that of making products for Quality Manufacturing Corporation’s plant to sell and make profit. He makes key decisions for the facility. He meets the definition of Responsible Official found in 567 IAC 22.100(455B).

F. Notes:

• Polk County AQD Construction Permit number 1128 Modified was voided by Polk County AQD Permit #1849.
• Polk County AQD Construction Permit number 1848 was voided by Polk County AQD Permit #1848 Modified on 10/10/2007.
• Polk County AQD Construction Permit number 1848 Modified was voided by Polk County AQD Permit #1848 Modified #2 on 2/24/2016.
• Polk County AQD Construction Permit number 1849 was voided by Polk County AQD Permit #1849 Modified on 9/19/2012.
• Polk County AQD Construction Permit number 1850 was voided by Polk County AQD Permit #1850 Modified on 9/24/2012.
• Polk County AQD Construction Permit number 1851 was voided by Polk County AQD Permit #1851 Modified on 9/24/2012.
- Polk County AQD Construction Permit number 1853 was voided by Polk County AQD Permit #1853 Modified on 4/11/2014.
- Polk County AQD Construction Permit number 1853 Modified was voided by Polk County AQD Permit #1853 Modified #2 on 2/24/2016.
- Polk County AQD Construction Permit number 2297 was voided by Polk County AQD Permit #2297 Modified on 9/27/2012.
- Polk County AQD Construction Permit number 2297 Modified was voided by Polk County AQD Permit #2297 Modified #2 on 4/11/2014.
- Polk County AQD Construction Permit number 2297 Modified #2 was voided by Polk County AQD Permit #2297 Modified #3 on 7/11/2019.
- Polk County AQD Construction Permit number 2298 was voided by Polk County AQD Permit #2298 Modified on 9/28/2012. PC AQD # 2298 Modified was administratively corrected on 7/14/2014.
- Polk County AQD Construction Permit number 2299 was voided by Polk County AQD Permit #2299 Modified on 9/28/2012. PC AQD # 2299 Modified was administratively corrected on 7/14/2014.

G. Permit Issuance